

From: Hambrick, Amy
Sent: Wednesday, May 16, 2018 04:40 PM
To: Marsh, Karen; Mia, Marcia
Subject: RE: Technical Assistance: 0000a

Agree. Thanks.

Amy Hambrick

U.S. Environmental Protection Agency

(919)541-0964

From: Marsh, Karen
Sent: Wednesday, May 16, 2018 9:45 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: Technical Assistance: 0000a

I agree with your responses here.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia
Sent: Monday, May 14, 2018 1:06 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: FW: Technical Assistance: 0000a

My thoughts in red.

Marcia B Mia, Acting Chief

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From: Ursula Guzman [mailto:Ursula.Guzman@Tceq.Texas.Gov]

Sent: Monday, May 14, 2018 12:15 PM

To: Mia, Marcia Mia.Marcia@epa.gov

Subject: Technical Assistance: 0000a

Hi Ms. Marcia,

I attended the EPA Inspector Training Workshop via webinar last week and had a few questions about the 90-day stay and two year stay.

I have an oil and gas well site facility that submitted a deviation indicating failure to meet the standard and recordkeeping requirements of 60.5393a (b)(2) for pneumatic pumps from February 15, 2017 - July 31, 2017. The reason was regulatory uncertainty due to the regulatory stay. For the review of this facility and others in the future:

What does a stay do for a regulated entity? A "stay" is a legal mechanism to "halt" the requirements of a rule. During a stay, a source does not have to comply the requirements of the rule which are stayed.

Did a two year stay become effective? None

What is the start date that a pneumatic pump affected facility should be in compliance with 0000a requirements. Ex. 5 Deliberative Process (DP)

Since the 90-day stay was effective June 2, 2017 - August 31, 2017, would the entity's deviation actually be from February 15, 2017 - June 1, 2017 instead of being through July 31, 2017? Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

If you have a moment to discuss this topic, I'd appreciate a phone call or email back at your convenience.

Best Regards,

Ursula Guzman

Environmental Investigator

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